

# **EXHIBIT 3**

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**From:** Houghton-Larsen, M Annie  
**Sent:** Tuesday, December 24, 2024 9:19 AM  
**To:** Joseph Cammarata, Esq.  
**Cc:** Governski, Meryl Conant; Nathan, Aaron E.  
**Subject:** RE: Freeman v. Giuliani - Urgent re Deposition Scheduling  
**Attachments:** Placa Package.pdf

Joe,

Plaintiffs personally served Monsignor Placa this morning at 7 a.m. As a reminder, this deposition is noticed for December 26, 2024 at 4:00p.m. in Palm Beach, Florida, and will take place at West Palm Beach Marriott, 1001 Okeechobee Blvd., West Palm Beach, Florida 33401.

Thank you,

**M. Annie Houghton-Larsen**  
**Willkie Farr & Gallagher LLP**  
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Pronouns: she, her, hers

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**From:** Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>  
**Sent:** Monday, December 23, 2024 5:26 PM  
**To:** Joseph Cammarata, Esq. <Joe@CammarataLawPC.com>  
**Cc:** Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>  
**Subject:** RE: Freeman v. Giuliani - Urgent re Deposition Scheduling

Joe,

As we previewed below, Plaintiffs spent another day attempting to serve Monsignor Placa with a deposition subpoena without success—Plaintiffs’ process server made repeated attempts at his house and we left a message at the phone number you provided in your 5 p.m. filing. Plaintiffs have also been unable to serve Mr. Ragusa in person despite repeated attempts and Mr. Ragusa refused service by email.

Unless you are willing to accept service of these subpoenas by email today or engage in efforts to help us serve the subpoenas by no later than tomorrow (Christmas eve), we will plan to write the court explaining our efforts and ask that the Court preclude both Monsignor Placa and Mr. Ragusa from testifying at trial.

Please promptly advise,

**M. Annie Houghton-Larsen**  
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Pronouns: she, her, hers

**From:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Sent:** Sunday, December 22, 2024 4:38 PM  
**To:** Joseph Cammarata, Esq. <[Joe@CammarataLawPC.com](mailto:Joe@CammarataLawPC.com)>  
**Cc:** Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>  
**Subject:** RE: Freeman v. Giuliani - Urgent re Deposition Scheduling

Joe,

On Friday we emailed you seeking to work together to serve subpoenas and schedule the depositions of the witnesses who Mr. Giuliani intends to call at trial. We never received any response.

Since Friday, we have expended considerable time and expense attempting to serve the witnesses Mr. Giuliani intends to call at trial. We will continue to attempt to do so tomorrow, but given the holidays and the December 31 deadline imposed by the Court, we will be forced to cease our attempts after tomorrow, which as you know means that the Court may preclude certain witnesses from testifying at trial despite our diligent efforts. We again implore your assistance to avoid that consequence.

Please see below the current status of our efforts.

- **Monsignor Placa** – We have been attempting to serve Monsignor Placa at the address we believe is correct for him (the one you provided is not a real address as we previously noted), but have yet to be successful. Monsignor Placa's deposition is noticed for December 26, 2024 at 4 p.m. in Palm Beach, Florida. **Please promptly advise if you can provide assistance in serving Monsignor Placa.**
- **Michael Ragusa** – We called Mr. Ragusa and attempted to serve him via email, which he declined. We are continuing to attempt personal service. Mr. Ragusa's deposition is noticed for December 27, 2024 at 9 a.m. at Willkie's New York office. **Please promptly advise if you can provide assistance in serving Mr. Ragusa.**
- **Maria Ryan** – Dr. Ryan's deposition was noticed and properly served for December 30, 2024 at 9:00 a.m. at Willkie's New York office.
- **Ted Goodman** – Mr. Goodman's deposition was noticed and properly served for December 30, 2024 at 1:00 p.m. at Willkie's New York office.
- **Ryan Medrano** – Mr. Medrano's deposition was noticed and properly served for December 31, 2024 at 9 a.m. in Willkie's New York office.
- **Joseph Ricci** – We are working with Mr. Ricci to find a mutually agreeable time for a deposition, which was noticed and properly served. It has not yet been scheduled and likely will occur after December 31, 2024, assuming that Mr. Giuliani does not list his as a trial witness.

Thanks,  
Annie

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Pronouns: she, her, hers

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**From:** Houghton-Larsen, M Annie <[MHoughton-Larsen@willkie.com](mailto:MHoughton-Larsen@willkie.com)>  
**Sent:** Friday, December 20, 2024 4:14 PM  
**To:** Joseph Cammarata, Esq. <[Joe@CammarataLawPC.com](mailto:Joe@CammarataLawPC.com)>  
**Cc:** Governski, Meryl Conant <[MGovernski@willkie.com](mailto:MGovernski@willkie.com)>; Nathan, Aaron E. <[ANathan@willkie.com](mailto:ANathan@willkie.com)>  
**Subject:** Freeman v. Giuliani - Urgent re Deposition Scheduling

Joe,

I'm writing in light of the Court's order today, which includes the following provision: **"No witness will be permitted to testify unless that witness has made full compliance with any interrogatories or document requests and shall have submitted himself or herself to a noticed deposition by December 31, 2024, absent a showing of good cause."**

Given the time constraints and the holidays, we believe the only way to ensure that all four of the late-disclosed witnesses (Dr. Ryan, Mr. Medrano, Monsignor Placa, Mr. Ragusa) who Mr. Giuliani intends to call during trial receive document and deposition subpoenas in advance of December 31, 2024 is for us to work collaboratively on serving and scheduling the depositions.

As far as Dr. Ryan, we have already served her with a deposition subpoena and intend to take her deposition on December 30 at the time and place in the subpoena. As of today, Dr. Ryan has produced only a single document, which does not reflect a full production. If we do not receive her full production before the end of next Friday, we will inform the Court that it would be within its rights to preclude her testimony pursuant to today's order.

As far as the other three witness, please confirm by 5:30pm today which of the following options is preferable to each of the other three witnesses. If we do not receive confirmation by 5:30pm today, we will resume our own efforts to personally serve them with deposition subpoenas that include a date, time, and location of our choosing. If we are unable to properly serve any of the three individuals despite diligent efforts, or if they do not make a full production in advance of the noticed deposition times, or do not appear for the deposition at the date, time, and place so noticed, we will inform that it would be within its rights to preclude their testimony pursuant to today's order.

Please confirm by 5:30 p.m. today each witness' preference among the options below:

- **Monsignor Placa:** December 26 at 4 p.m. in Palm Beach or December 28 at 9 a.m. in Palm Beach
  - o **The address you previously provided does not exist.** If we do not receive an updated one by 5:30 p.m. today, we will attempt to serve at whatever address we identify.
- **Mr. Ragusa:** December 27 at 9:00 a.m. in New York or December 31 at 9:00 a.m. in New York
  - o **You did not provide an address.** If we do not receive an updated one by 5:30 p.m. today, we will attempt to serve at whatever address we identify.
- **Mr. Medrano:** December 31 at 9:00 a.m. in New York or December 31 at 9:00 a.m. at a location of his choice

**Please provide by 5:30 p.m. today the requested information.** If you do not, we will have no choice but to proceed with attempting service by all means available, but cannot guarantee those attempts will be successful given the difficulties with service thus far. Moreover, Mr. Giuliani will knowingly be taking the risk of preclusion if we are unable to properly serve any of the individuals above.

Thank you,  
Annie

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